

**PERMIT NO. 2436-017-0031-V-05-0**

**ISSUANCE DATE:**



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

**ENVIRONMENTAL PROTECTION DIVISION**

**Air Quality - Part 70 Operating Permit**

**Facility Name:** Southern Veneer Products  
**Facility Address:** 240 Peachtree Road  
Fitzgerald, Georgia 31750, Ben Hill County  
**Mailing Address:** P.O. Box 278  
Fitzgerald, Georgia 31750  
**Parent/Holding Company:** Veneer Products Acquisition, LLC  
**Facility AIRS Number:** 04-13-017-00031

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a Part 70 Permit for:

**The operation of a softwood veneer and plywood manufacturing facility.**

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit. Unless modified or revoked, this Permit expires five years after the issuance date indicated above.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above, for any misrepresentation made in Title V Application TV-522982 signed on January 29, 2021, any other applications upon which this Permit is based, supporting data entered therein or attached thereto, or any subsequent submittal of supporting data, or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **43** pages.



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Richard E. Dunn, Director  
Environmental Protection Division

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**PART 1.0 FACILITY DESCRIPTION****1.1 Site Determination**

There are no other facilities which are contiguous or adjacent and under common control.

**1.2 Previous and/or Other Names**

Fitzgerald Forest Products  
Springfield Forest Products

**1.3 Overall Facility Process Description**

The facility receives raw logs that are first debarked and cut into blocks. The logs are then placed in a steam vat to soften the wood and then placed in a lathe that peels the logs into green veneer. Usable veneer is dried in one of three natural gas, direct fired dryers (Source Codes DR01, DR02, and DR03). The majority of this dried veneer is sold as product. The remainder is sent to the layout line, where it is composed with glue and then pressed by a hot press (Source Code PR01) into panels. The panels are then sent to plywood saws to be cut into finished dimensions. A regenerative thermal oxidizer (Source Code RTO1) controls the exhaust from dryers 1 and 2. A second regenerative thermal oxidizer (Source Code RTO2) controls the exhaust from dryer 3. Emissions from the 44-opening platen press (Source Code PR01) are uncontrolled. Three natural gas fired boilers (Source Codes BOI2, BOI3, and BOI4) provide the heat for the vat and the press.

**PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY**

**2.1 Facility Wide Emission Caps and Operating Limits**

None applicable.

**2.2 Facility Wide Federal Rule Standards**

None applicable.

**2.3 Facility Wide SIP Rule Standards**

None applicable.

**2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit**

None applicable.

**PART 3.0 REQUIREMENTS FOR EMISSION UNITS**

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

**3.1 Emission Units**

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
BOI2	Steam Boiler 2 (11.8 MMBTU/hr)	40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
BOI3	Steam Boiler 3 (11.8 MMBTU/hr)	40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
BOI4	Steam Boiler 4 (9.9 MMBTU/hr)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
DR01	Veneer Dryer 1 (24 MMBTU/hr)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	RTO1	Regenerative Thermal Oxidizer 1
DR02	Veneer Dryer 2 (24 MMBTU/hr)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	RTO1	Regenerative Thermal Oxidizer 1
DR03	Veneer Dryer 3 (55 MMBTU/hr)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	RTO2	Regenerative Thermal Oxidizer 2
PR01	Plywood Press	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None

\* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

**3.2 Equipment Emission Caps and Operating Limits**

None.

### 3.3 Equipment Federal Rule Standards

#### 40 CFR 60 Subpart Dc – NSPS for Small Industrial-Commercial-Institutional Steam Generating Units

- 3.3.1 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A – “General Provisions” and 40 CFR 60 Subpart Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units,” for operation of Steam Boiler 2 (Source Code BOI2) and Steam Boiler 3 (Source Code BOI3).  
[40 CFR 60.40c]

#### 40 CFR 63 Subpart DDDDD – NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

- 3.3.2 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR Part 63 Subpart A – “General Provisions” and in 40 CFR 63 Subpart DDDDD – “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters” for operation of Steam Boiler 2 (Source Code BOI2), Steam Boiler 3 (Source Code BOI3), and Steam Boiler 4 (Source Code BOI4).  
[40 CFR 63.7480]
- 3.3.3 If any boiler or process heater is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.  
[40 CFR 63.7540(a)(13)]
- 3.3.4 The Permittee shall conduct annual tune-ups for Steam Boilers 2 and 3 (Source Code BOI2 and BOI3) and biennial tune-ups for Steam Boiler 4 (Source Code BOI4) to demonstrate continuous compliance as specified in paragraphs a. through e. of this condition. Each annual tune-up must be conducted no more than 13 months after the previous tune-up. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.  
[40 CFR 63.7500(a)(1); 40 CFR 63.7505(a); 40 CFR 63.7540(a)(10); 40 CFR 63.7515(d); Table 3, Items 2 and 3 of 40 CFR 63 Subpart DDDDD]
- a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the burner inspection may be delayed until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
  - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer’s specifications, if available;

- c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the inspection may be delayed until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;
- d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject;
- e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- f. Maintain on-site and submit, if requested by the Division, an annual report containing the information in the paragraphs below:
  - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
  - ii. A description of any corrective actions taken as a part of the tune-up; and
  - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

40 CFR 63 Subpart DDDD – NESHAP for Plywood and Composite Wood Products

- 3.3.5 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR Part 63 Subpart A – “General Provisions” and in 40 CFR 63 Subpart DDDD – “National Emissions Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.”  
[40 CFR 63.2231]
- 3.3.6 The Permittee shall use Regenerative Thermal Oxidizer 1 (Source Code RTO1) for Veneer Dryers 1 and 2 (Source Codes DR01 and DR02) and Regenerative Thermal Oxidizer 2 (Source Code RTO2) for Veneer Dryer 3 (Source Code DR03) to reduce emissions of total HAP from the dryers, measured as total hydrocarbon (THC) (as carbon), by 90 percent or more. The Permittee may choose to subtract methane from THC (as carbon) measurements.  
[40 CFR 63.2240; Table 1B, Option 1 of 40 CFR 63 Subpart DDDD]



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- 3.3.7 The Permittee shall maintain the 3-hour block average firebox temperatures of Regenerative Thermal Oxidizer 1 (Source Code RTO1) and Regenerative Thermal Oxidizer 2 (Source Code RT02) above the minimum temperatures established during performance testing meeting the provisions of Condition 4.2.1, as applicable, except during performance testing that is being done to demonstrate that operation at a lower temperature will assure compliance.  
[40 CFR 63.2240; Table 2, Option 1 of 40 CFR 63 Subpart DDDD]
- 3.3.8 The Permittee shall operate and maintain the affected source, including air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by Subpart DDDD. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved.  
[40 CFR 63.2250(g)]
- 3.3.9 The Permittee shall maintain a written Work Practice Implementation Plan that defines the work practices for Veneer Dryers 1, 2, and 3 (Source Codes DR01, DR02, and DR03) that minimize fugitive emissions from the dryer green end heated zone and the dryer doors. Any modifications to this plan must be submitted with the semiannual report required by Condition 6.1.4.  
[40 CFR 63.2241(a); 40 CFR 63.2265; Table 3, Item 3 of 40 CFR 63 Subpart DDDD]
- 3.3.10 For Group 1 miscellaneous coating operations, the Permittee shall use non-HAP coatings as defined in 40 CFR 63.2292. Non-HAP coatings means a coating with HAP contents below 0.1 percent by mass for OSHA-defined carcinogens as specified in Section A.6.4 of Appendix A to 29 CFR 1910.1200, and below 1.0 percent by mass for other HAP compounds.  
[40 CFR 63.2241(a); Table 3, Item 5 and Table 8, Item 5 of 40 CFR 63 Subpart DDDD]
- 3.3.11 The Permittee shall follow documented site-specific procedures such as use of automated controls or other measures that they have developed to protect workers and equipment to ensure that the flow of raw materials (such as furnish or resin) and fuel or process heat (as applicable) ceases and that material is removed from the process unit(s) as expeditiously as possible given the system design to reduce air emissions while process units and control systems are undergoing safety-related shutdowns.  
[40 CFR 63.2241(a); Table 3, Item 6 of 40 CFR 63 Subpart DDDD; Table 8, Item 6 of 40 CFR 63 Subpart DDDD]
- 3.3.12 If and when Veneer Dryers 1, 2 and 3 (Source Codes DR01, DR02, and DR03) are undergoing startup or shutdown of gas-fired burners, the Permittee shall cease feeding green veneer into the softwood veneer dryer and minimize the amount of time direct gas-fired softwood veneer dryers are vented to the atmosphere due to the shutoff of direct-fired burners resulting from partial and full production stoppages of direct-fired softwood veneer dryers or over-temperature events.  
[40 CFR 63.2241(a); Table 3, Item 8 of 40 CFR 63 Subpart DDDD; Table 8, Item 8 of 40 CFR 63 Subpart DDDD]

### 3.4 Equipment SIP Rule Standards

#### Boilers

- 3.4.1 The Permittee shall not burn any fuel other than natural gas in Steam Boiler 2, 3 or 4 (Source Codes BOI2, BOI3, and BOI4).  
[391-3-1-.03(2)(c)]
- 3.4.2 The Permittee shall not cause, let, suffer, permit, or allow any emissions from Steam Boiler 2 or 3 (Source Codes BOI2 and BOI3) which:
- a. Contain fly ash and/or other PM in amounts equal to or exceeding the rate derived from  $P = 0.5(10/R)^{0.5}$  where R equals heat input rate in million BTU per hour and P equals the allowable emission rate in pounds per million BTU.  
[391-3-1-.02(2)(d)2.(ii)]
  - b. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six minute period per hour of not more than 27 percent opacity.  
[391-3-1-.02(2)(d)3; 391-3-1-.02(2)(b)1 subsumed]
- 3.4.3 The Permittee shall not cause, let, suffer, permit, or allow any emissions from Steam Boiler 4 (Source Code BOI4) which:
- a. Contain fly ash and/or other PM in amounts equal to or exceeding 0.5 pounds per million BTU heat input.  
[391-3-1-.02(2)(d)2.(i)]
  - b. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six minute period per hour of not more than 27 percent opacity.  
[391-3-1-.02(2)(d)3]
- 3.4.4 The Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in Steam Boiler 2, 3, or 4 (Source Codes BOI2, BOI3, and BOI4), unless otherwise specified by the Director.  
[391-3-1-.02(2)(g)2]

#### Veneer Dryers

- 3.4.5 The Permittee shall not burn any fuel other than natural gas in Veneer Dryer 1, 2, or 3 (Source Codes DR01, DR02, and DR03).  
[391-3-1-.03(2)(c)]
- 3.4.6 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from Veneer Dryer 1, 2, or 3 (Source Codes DR01, DR02, and DR03), any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.  
[391-3-1-.02(2)(b)1]

- 3.4.7 The Permittee shall not cause, let, suffer, permit, or allow the emission from Veneer Dryer 1, 2, or 3 (Source Codes DR01, DR02, and DR03), PM in total quantities equal to or exceeding the allowable rate as calculated using the equation below, unless otherwise specified in this Permit.  
[391-3-1-.02(2)(e)1]

$$E = 4.1P^{0.67}, \text{ for process input weight rate up to and including 30 tons per hour}$$

Where:

E = allowable emission rate in pounds per hour;

P = process input weight rate in tons per hour.

- 3.4.8 The Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in Veneer Dryer 1, 2, or 3 (Source Codes DR01, DR02, and DR03), unless otherwise specified by the Director.  
[391-3-1-.02(2)(g)2]

Plywood Press

- 3.4.9 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the Plywood Press (Source Code PR01), any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.  
[391-3-1-.02(2)(b)1]

- 3.4.10 The Permittee shall not cause, let, suffer, permit, or allow the emission from the Plywood Press (Source Code PR01), PM in total quantities equal to or exceeding the allowable rate as calculated using the equation below, unless otherwise specified in this Permit.  
[391-3-1-.02(2)(e)1]

$$E = 4.1P^{0.67}, \text{ for process input weight rate up to and including 30 tons per hour}$$

Where:

E = allowable emission rate in pounds per hour;

P = process input weight rate in tons per hour.

**3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit**

None Applicable.

**PART 4.0 REQUIREMENTS FOR TESTING****4.1 General Testing Requirements**

- 4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division (“Division”). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.  
[391-3-1-.02(6)(b)1(i)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.  
[391-3-1-.02(3)(a) and 40 CFR 63.7(b)(1)]
- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 of this permit are as follows:
- a. Method 1 shall be used for selection of sampling site and number of traverse points.
  - b. Method 2 shall be used to determine stack gas velocity and volumetric flow rate.
  - c. Method 3, 3A, or 3B shall be used to determine stack gas molecular weight.
  - d. Method 3B shall be used for determination of the emissions rate correction factor or excess air. Method 3A may be used as an alternative.
  - e. Method 4 shall be used for moisture determination.
  - f. Method 5, 5B, or 17, shall be used as applicable, for the determination of PM concentration. Test method requirements of 40 CFR 60.45c(a) shall be followed for each run.
  - g. Method 9 and the procedures of Section 1.3 of the above referenced document shall be used for the determination of visible emissions.
  - h. Method 10 shall be used to determine the CO concentration.
  - i. Method 19 shall be used, when applicable, to convert PM and SO<sub>2</sub> concentrations (i.e., grains/dscf for PM; ppm for gaseous pollutants), as determined using other methods specified in this section, to emission rates (i.e., lb/MMBtu).

- j. Method 25A shall be used for purposes of 40 CFR 63, Subpart DDDD. The Permittee may measure emissions of methane using EPA Method 18 in appendix A to 40 CFR Part 60 and subtract the methane emissions from the emissions of total HAP as THC.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

- 4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.

[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a); 40 CFR 63.2281(h)]

## 4.2 Specific Testing Requirements

### 40 CFR 63 Subpart DDDD – NESHAP for Plywood and Composite Wood Products

- 4.2.1 Performance tests required for Veneer Dryers 1, 2, and 3 (Source Codes DR01, DR02, and DR03) by 40 CFR 63 Subpart DDDD shall be conducted according to the requirements in 40 CFR 63.7(e)(1) and the requirements in 40 CFR 63.2262(b) through (o), as is applicable, using methods specified in Table 4 of 40 CFR 63 Subpart DDDD and Condition 4.1.3. The performance tests shall be conducted as follows:

[40 CFR 63.2262(a) and (b)]

- a. Tests shall be carried out under representative operating conditions. Representative operating conditions (40 CFR 63.2292) means operation of a process unit during performance testing under the conditions that the process unit will typically be operating in the future, including use of a representative range of materials (e.g., wood material of a typical species mix and moisture content or typical resin formulation) and representative operating temperature range. Representative operating conditions exclude periods of startup and shutdown. The Permittee may not conduct performance tests during periods of malfunction. The performance test report shall describe representative operating conditions for the process and control systems and explain why they are representative. The Permittee must record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions are representative. Upon request, the Permittee shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests.

[40 CFR 63.2262(b); 40 CFR 63.7(e)(1); 40 CFR 63.2292]

- b. Each test shall contain at least three separate test runs as per 40 CFR 63.7(e)(3). Each test run must last at least 1 hour.

[40 CFR 63.2262(c)]

- c. Sampling sites shall be located at the inlet and outlet of the control device and prior to any releases to the atmosphere. For control sequences with wet control devices followed by control devices, sampling sites may be located at the inlet and outlet of the control sequence and prior to any releases to the atmosphere.  
[40 CFR 63.2262(d)(1)]
- d. Operating parameter monitoring system or continuous emissions monitoring system (CEMS) data shall be collected at least every 15 minutes during the entire performance test. The parameter or concentration value for the operating parameter during the performance test shall be determined using the methods specified in Condition 4.1.3 and Table 4 of 40 CFR 63 Subpart DDDD.  
[40 CFR 63.2262(e)]
- e. All nondetect data (40 CFR 63.2292) shall be treated as one-half of the method detection limit when determining total HAP, formaldehyde, methanol, or total hydrocarbon (THC) emission rates.  
[40 CFR 63.2262(g)(1)]

- 4.2.2 During any performance test for Veneer Dryer 1, 2, or 3 (Source Codes DR01, DR02, and DR03) required by Condition 4.2.1, the Permittee shall continuously monitor, during each of the required 1-hour test runs, the combustion zone temperature of the applicable Regenerative Thermal Oxidizer. The minimum firebox temperature must then be established as the average of the three minimum 15-minute temperatures monitored during the three test runs. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.

The Permittee may establish a different minimum firebox temperature for a Regenerative Thermal Oxidizer by submitting the notification specified in Condition 6.2.7 and conducting a repeat performance test, as specified in the paragraph above, that demonstrates compliance with Condition 3.3.6.  
[40 CFR 63.2262(k)]

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)****5.1 General Monitoring Requirements**

- 5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.  
[391-3-1-.02(6)(b)1]

**5.2 Specific Monitoring Requirements**

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

40 CFR 63 Subpart DDDD – NESHAP for Plywood and Composite Wood Products

- a. Combustion zone temperature for both the Regenerative Thermal Oxidizer 1 (Source Code RTO1) and Regenerative Thermal Oxidizer 2 (Source Code RTO2), at a position prior to any substantial heat loss/exchange. The data shall be managed as described in Condition 5.2.4.  
[40 CFR 63.2270]

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- 5.2.2 For 40 CFR 63 Subpart DDDD, the Permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) as follows:  
[40 CFR 63.2269(a)]
- a. The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
- b. At all times, maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- c. Record the results of each inspection, calibration, and validation check.
- 5.2.3 For each temperature device used to meet the requirements of 40 CFR 63 Subpart DDDD, the Permittee shall meet the following requirements:  
[40 CFR 63.2269(b)]
- a. Locate the temperature sensor in a position that provides a representative temperature.

- b. Use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the temperature value, whichever is larger.
- c. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20°F.
- d. Validate the temperature sensor's reading at least semiannually using one of the requirements below:
  - i. Compare measured readings to a National Institute of Standards and Technology (NIST) traceable temperature measurement device or simulate a typical operating temperature using a NIST traceable temperature simulation device. When the temperature measurement device method is used, the sensor of the NIST traceable calibrated device must be placed as close as practicable to the process sensor, and both devices must be subjected to the same environmental conditions. The accuracy of the temperature measured must be 2.5 percent of the temperature measured by the NIST traceable device or 5°F, whichever is greater.
  - ii. Follow applicable procedures in the thermocouple manufacturer owner's manual.
  - iii. Request thermocouple manufacturer to certify or re-certify electromotive force (electrical properties) of the thermocouple.
  - iv. Replace thermocouple with a new certified thermocouple in lieu of validation.
  - v. Permanently install a redundant temperature sensor as close as practicable to the process temperature sensor. The sensors must yield a reading within 30°F of each other for thermal oxidizers and catalytic oxidizer.
- e. Conduct validation checks using the procedures in paragraph d. of this condition any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
- f. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

5.2.4 For the purposes of 40 CFR 63 Subpart DDDD, the Permittee shall monitor and collect data according to the following requirements:  
[40 CFR 63.2270(b), (c), (d), and (f)]

- a. Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee must conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, the Permittee must not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance



or control activities. The Permittee must use all the data collected during all other periods in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.

- b. The Permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities, or data recorded during periods of safety-related shutdown, pressurized refiner startup or shutdown, startup and shutdown of direct-fired softwood veneer dryer gas-fired burners, or control device downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. The Permittee must use all the data collected during all other periods in assessing the operation of the control system.
- c. The Permittee shall determine the 3-hour block average of all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described in paragraphs a. and b. of this condition).
- d. To calculate the data averages for each 3-hour or 24-hour averaging period, the Permittee must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (i.e., not from periods described in paragraphs a. and b. of this condition).

- 5.2.5 The Permittee shall use Regenerative Thermal Oxidizer 1 (Source Code RTO1) and Regenerative Thermal Oxidizer 2 (Source Code RTO2) records required by Condition 5.2.1.a to determine and record the 3-hour block average of all recorded readings, calculated after every three hours of operation as the average of the evenly spaced recorded readings in the previous three operating hours.  
[40 CFR 63.2271(a)]

**PART 6.0 RECORD KEEPING AND REPORTING REQUIREMENTS****6.1 General Record Keeping and Reporting Requirements**

- 6.1.1 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry.

[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)]

- 6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions.

The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.

[391-3-1-.02(6)(b)1(iv), 391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]

- 6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.

[391-3-1-.03(10)(d)1.(i) and 40 CFR 70.6(a)(3)(iii)(B)]

- 6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29 and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)(A)]

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.

- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

6.1.5 Where applicable, the Permittee shall keep the following records:  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(ii)(A)]

- a. The date, place, and time of sampling or measurement;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.

6.1.6 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6 (a)(3)(ii)(B)]

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii); 40 CFR 63 Subpart DDDD]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

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- i. For 40 CFR 63 Subpart DDDD, any time a HAP coating, as defined in 40 CFR 63.2292, is used in any Group 1 miscellaneous coating operation at the facility.  
[40 CFR 63.2271; 40 CFR 63.2281; Table 8, Item 5 of 40 CFR 63 Subpart DDDD]
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

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- i. For 40 CFR 63 Subpart DDDD, any 3-hour block average combustion zone temperature for Regenerative Thermal Oxidizer 1 (Source Code RTO1) or Regenerative Thermal Oxidizer 2 (Source Code RTO2) that is below the temperature established during the most recent compliance test conducted in accordance with Condition 4.2.1, as applicable.  
[40 CFR 63.2271; 40 CFR 63.2281; Table 7, Item 1 of 40 CFR 63 Subpart DDDD]
- ii. For 40 CFR 63 Subpart DDDD, any failure to follow the work practices defined in the Work Practice Implementation Plan, required by Condition 3.3.9, for Veneer Dryer 1, 2, or 3 (Source Codes DR01, DR02, and DR03).  
[40 CFR 63.2271; 40 CFR 63.2281; Table 8, Item 3 of 40 CFR 63 Subpart DDDD]
- iii. For 40 CFR 63 Subpart DDDD, any failure to perform the quality assurance checks, as specified in Condition 5.2.3, or failure to correct any problems revealed by these checks.  
[40 CFR 63 Subpart DDDD]

- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

40 CFR 63 Subpart DDDDD – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters

- i. Any failure to comply with the work practice standards for 40 CFR 63 Subpart DDDDD required by Condition 3.3.4.

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- ii. Any modification to the Work Practice Implementation Plan, required by Condition 3.3.9, for Veneer Dryer 1, 2, or 3 (Source Codes DR01, DR02, and DR03).

## **6.2 Specific Record Keeping and Reporting Requirements**

40 CFR 60 Subpart Dc – NSPS for Small Industrial-Commercial-Institutional Steam Generating Units

- 6.2.1 The Permittee shall record and maintain records of the amount of fuel combusted in Steam Boiler 2 (Source Code BOI2) and Steam Boiler 3 (Source Code BOI3) during each calendar month.  
[40 CFR 60.48c(g)(2)]

40 CFR 63 Subpart DDDDD – NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

- 6.2.2 For 40 CFR 63 Subpart DDDDD, the Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4), and (6), and 63.9(b) through (h), as applicable, by the dates specified in those sections.  
[40 CFR 63.7545(a)]
- 6.2.3 For 40 CFR 63 Subpart DDDDD, the Permittee shall submit the compliance report semiannually, annually, biennially or every 5 years, according to the requirements in 40 CFR 63.7550(b) with the information listed below.  
[40 CFR 63.7550, Table 9 to 40 CFR 63 Subpart DDDDD]
- a. Information required in Condition 6.2.6.
  - b. Applicable information required based on the compliance options according to the requirements in 40 CFR 63.7550(c)(2), (3) and (4).
  - c. If there are no deviations from the applicable requirements for work practice standards in Condition 3.3.4, a statement that there were no deviations from the work practice standards during the reporting period.

- 6.2.4 For 40 CFR 63 Subpart DDDDD, the Permittee shall submit each compliance report, according to Condition 6.2.3 and this condition. For boilers and process heaters subject only to a requirement to conduct an annual, biennial, or 5-year tune-up, respectively, according to 40 CFR 63.7540(a)(10), and not subject to emission limits or operating limits, submit only an annual, biennial, or 5-year compliance report, respectively, instead of a semi-annual compliance report. Each annual, biennial, or 5 year compliance report must cover the applicable 1-year, 2-year or 5-year reporting periods from January 1 to December 31, and must be postmarked or submitted no later than January 31.  
[40 CFR 63.7550(b)]
- 6.2.5 For 40 CFR 63 Subpart DDDDD, the Permittee shall submit a compliance report with the information in paragraphs a. through f. of this condition.  
[40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i) through (iv), (xiv), and (xvii)]
- a. Company and Facility name and address.
  - b. Process unit information, emissions limitations, and operating parameter limitations.
  - c. Date of report and beginning and ending dates of the reporting period.
  - d. The total operating time during the reporting period.
  - e. Include the date of the most recent tune-up. Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown.
  - f. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- 6.2.6 For 40 CFR 63 Subpart DDDDD, the Permittee shall maintain the following records: a copy of each notification and report submitted by the Permittee to comply with 40 CFR 63 Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status annual compliance reports.  
[40 CFR 63.10(b)(2)(xiv) and 40 CFR 63.7555(a)(1)]

**40 CFR 63 Subpart DDDD – NESHAP for Plywood and Composite Wood Products**

- 6.2.7 For 40 CFR 63 Subpart DDDD, the Permittee shall notify the Division within 30 days before the Permittee takes any of the following actions:  
[40 CFR 63.2280(g)]
- a. Modify or replace the control system for any process unit subject to the compliance options and operating requirements of 40 CFR 63 Subpart DDDD.
  - b. Change a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device.

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6.2.8 For 40 CFR 63 Subpart DDDD, the Permittee shall submit each compliance report by February 28 and August 29 for the semiannual reporting periods ending December 31 and June 30, respectively.  
[40 CFR 63.2281(b)(4)]

6.2.9 The Permittee shall submit each compliance report required by 40 CFR 63.2281(a), 40 CFR 63.2281(b), and Table 9 of 40 CFR 63 Subpart DDDD in accordance with Conditions 6.1.3 and 6.1.4.  
[40 CFR 63.2281(a) and (b)]

The Permittee must submit a(n)	The report must contain	The Permittee must submit the report
(1) Compliance report.	The information in 40 CFR 63.2281(c) through (g).	Semiannually according to the requirements in 40 CFR 63.2281(b).

6.2.10 For 40 CFR 63 Subpart DDDD, the semiannual report required by Condition 6.2.9 shall contain the following information. This report shall be submitted with the compliance report required in Conditions 6.1.3 and 6.1.4.  
[40 CFR 63.2281(c)]

- a. Company name and address.
- b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- c. Date of report and beginning and ending dates of the reporting period.
- d. The compliance report must include the number of instances and total amount of time during the reporting period in which each of the startup/shutdown work practice requirements in Table 3 to this subpart (rows 6 through 8) is used in place of the otherwise applicable compliance options, operating requirements, and work practice requirements (in Table 3 to this subpart rows 1 through 5). If a startup/shutdown work practice in Table 3 to this subpart (rows 6 through 8) is used for more than a total of 100 hours during the semiannual reporting period, the Permittee must report the date, time and duration of each instance when that startup/shutdown work practice was used.
- e. A description of control device maintenance performed while the control device was offline and one or more of the process units controlled by the control device was operating, including the following information:
  - i. The date and time when the control device was shut down and restarted.
  - ii. Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.

- f. If there are no deviations from any applicable compliance option or operating requirement, and there are no deviations from the requirements for work practice requirements in Table 8 to 40 CFR 63 Subpart DDDD, a statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period.
  - g. If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
  
- 6.2.11 For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in Table 8 to 40 CFR 63 Subpart DDDD at an affected source where the Permittee is not using a CMS to comply with the compliance options, operating requirements, or work practice requirements in 40 CFR 63 Subpart DDDD, the compliance report must contain the information in Conditions 6.2.10.a through 6.2.10.g and the paragraphs below. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.  
[40 CFR 63.2281(d)]
  - a. The total operating time of each affected source during the reporting period.
  - b. Information on the date, time, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
  
- 6.2.12 For each deviation from a compliance option, operating requirement, or work practice requirement occurring at an affected source where the Permittee uses a CMS to comply with the compliance options, operating requirements, or work practice requirements in 40 CFR 63 Subpart DDDD, the Permittee must include the information in Conditions 6.2.10.a through 6.2.10.g and the following paragraphs. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.  
[40 CFR 63.2281(e)]
  - a. The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.
  - b. The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR 63.8(c)(8).
  - c. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction; or during another period.
  - d. A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.



- e. A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes.
  - f. A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
  - g. A brief description of the process units.
  - h. A brief description of the CMS.
  - i. The date of the latest CMS certification or audit.
  - j. A description of any changes in CMS, processes, or controls since the last reporting period.
  - k. For any failure to meet Condition 3.3.6, provide an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions.
  - l. The total operating time of each affected source during the reporting period.
- 6.2.13 The Permittee shall report all deviations as defined in 40 CFR 63 Subpart DDDD in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Condition 6.2.10 along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in 40 CFR 63 Subpart DDDD, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.  
[40 CFR 63.2281(g)]
- 6.2.14 For 40 CFR 63 Subpart DDDD, the Permittee shall keep the following records on site for at least 2 years after the date of occurrence, measurement, maintenance, corrective action, report or record according to 40 CFR 63.10(b)(1). For the remaining 3 years these records can be maintained offsite:  
[40 CFR 63.2282(a); Table 8, Items 6 and 8 of 40 CFR 63 Subpart DDDD]
- a. A copy of each notification and report that the Permittee submitted to comply with 40 CFR 63 Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that the Permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).



**PART 7.0 OTHER SPECIFIC REQUIREMENTS****7.1 Operational Flexibility**

7.1.1 The Permittee may make Section 502(b)(10) changes as defined in 40 CFR 70.2 without requiring a Permit revision, if the changes are not modifications under any provisions of Title I of the Federal Act and the changes do not exceed the emissions allowable under the Permit (whether expressed therein as a rate of emissions or in terms of total emissions). For each such change, the Permittee shall provide the Division and the EPA with written notification as required below in advance of the proposed changes and shall obtain any Permits required under Rules 391-3-1-.03(1) and (2). The Permittee and the Division shall attach each such notice to their copy of this Permit.  
[391-3-1-.03(10)(b)5 and 40 CFR 70.4(b)(12)(i)]

- a. For each such change, the Permittee's written notification and application for a construction Permit shall be submitted well in advance of any critical date (typically at least 3 months in advance of any commencement of construction, Permit issuance date, etc.) involved in the change, but no less than seven (7) days in advance of such change and shall include a brief description of the change within the Permitted facility, the date on which the change is proposed to occur, any change in emissions, and any Permit term or condition that is no longer applicable as a result of the change.
- b. The Permit shield described in Condition 8.16.1 shall not apply to any change made pursuant to this condition.

**7.2 Off-Permit Changes**

7.2.1 The Permittee may make changes that are not addressed or prohibited by this Permit, other than those described in Condition 7.2.2 below, without a Permit revision, provided the following requirements are met:  
[391-3-1-.03(10)(b)6 and 40 CFR 70.4(b)(14)]

- a. Each such change shall meet all applicable requirements and shall not violate any existing Permit term or condition.
- b. The Permittee must provide contemporaneous written notice to the Division and to the EPA of each such change, except for changes that qualify as insignificant under Rule 391-3-1-.03(10)(g). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the Permit shield in Condition 8.16.1.
- d. The Permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the Permit, and the emissions resulting from those changes.

7.2.2 The Permittee shall not make, without a Permit revision, any changes that are not addressed or prohibited by this Permit, if such changes are subject to any requirements under Title IV of the Federal Act or are modifications under any provision of Title I of the Federal Act.  
[Rule 391-3-1-.03(10)(b)7 and 40 CFR 70.4(b)(15)]

**7.3 Alternative Requirements**

[White Paper #2]  
Not Applicable

**7.4 Insignificant Activities**

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

**7.5 Temporary Sources**

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]  
Not Applicable

**7.6 Short-term Activities**

Not Applicable

**7.7 Compliance Schedule/Progress Reports**

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]  
None Applicable

**7.8 Emissions Trading**

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]  
Not Applicable

**7.9 Acid Rain Requirements**

Not Applicable

**7.10 Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA)**

[391-3-1-.02(10)]

7.10.1 When and if the requirements of 40 CFR Part 68 become applicable, the Permittee shall comply with all applicable requirements of 40 CFR Part 68, including the following.

- a. The Permittee shall submit a Risk Management Plan (RMP) as provided in 40 CFR 68.150 through 68.185. The RMP shall include a registration that reflects all covered processes.
- b. For processes eligible for Program 1, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a. and the following additional requirements:
  - i. Analyze the worst-case release scenario for the process(es), as provided in 40 CFR 68.25; document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 40 CFR 68.22(a); and submit in the RMP the worst-case release scenario as provided in 40 CFR 68.165.

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- ii. Complete the five-year accident history for the process as provided in 40 CFR 68.42 and submit in the RMP as provided in 40 CFR 68.168
  - iii. Ensure that response actions have been coordinated with local emergency planning and response agencies
  - iv. Include a certification in the RMP as specified in 40 CFR 68.12(b)(4)
- c. For processes subject to Program 2, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
  - i. Develop and implement a management system as provided in 40 CFR 68.15
  - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
  - iii. Implement the Program 2 prevention steps provided in 40 CFR 68.48 through 68.60 or implement the Program 3 prevention steps provided in 40 CFR 68.65 through 68.87
  - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
  - v. Submit as part of the RMP the data on prevention program elements for Program 2 processes as provided in 40 CFR 68.170
- d. For processes subject to Program 3, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
  - i. Develop and implement a management system as provided in 40 CFR 68.15
  - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
  - iii. Implement the prevention requirements of 40 CFR 68.65 through 68.87
  - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
  - v. Submit as part of the RMP the data on prevention program elements for Program 3 as provided in 40 CFR 68.175
- e. All reports and notification required by 40 CFR Part 68 must be submitted electronically using RMP\*eSubmit (information for establishing an account can be found at [www.epa.gov/rmp/rmpesubmit](http://www.epa.gov/rmp/rmpesubmit)). Electronic Signature Agreements should be mailed to:

MAIL

**Risk Management Program (RMP) Reporting Center  
P.O. Box 10162  
Fairfax, VA 22038**

COURIER & FEDEX

**Risk Management Program (RMP) Reporting Center  
CGI Federal  
12601 Fair Lakes Circle  
Fairfax, VA 22033**

Compliance with all requirements of this condition, including the registration and submission of the RMP, shall be included as part of the compliance certification submitted in accordance with Condition 8.14.1.

### **7.11 Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)**

- 7.11.1 If the Permittee performs any of the activities described below or as otherwise defined in 40 CFR Part 82, the Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to 40 CFR 82.166.  
[Note: “MVAC-like appliance” is defined in 40 CFR 82.152.]
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- 7.11.2 If the Permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

**7.12 Revocation of Existing Permits and Amendments**

The following Air Quality Permits, Amendments, and 502(b)10 are subsumed by this permit and are hereby revoked:

Air Quality Permit and Amendment Number(s)	Dates of Original Permit or Amendment Issuance
2436-017-0031-V-05-0	August 1, 2016

**7.13 Pollution Prevention**

Not Applicable

**7.14 Specific Conditions**

Not Applicable

**PART 8.0 GENERAL PROVISIONS****8.1 Terms and References**

- 8.1.1 Terms not otherwise defined in the Permit shall have the meaning assigned to such terms in the referenced regulation.
- 8.1.2 Where more than one condition in this Permit applies to an emission unit and/or the entire facility, each condition shall apply and the most stringent condition shall take precedence.  
[391-3-1-.02(2)(a)2]

**8.2 EPA Authorities**

- 8.2.1 Except as identified as “State-only enforceable” requirements in this Permit, all terms and conditions contained herein shall be enforceable by the EPA and citizens under the Clean Air Act, as amended, 42 U.S.C. 7401, et seq.  
[40 CFR 70.6(b)(1)]
- 8.2.2 Nothing in this Permit shall alter or affect the authority of the EPA to obtain information pursuant to 42 U.S.C. 7414, “Inspections, Monitoring, and Entry.”  
[40 CFR 70.6(f)(3)(iv)]
- 8.2.3 Nothing in this Permit shall alter or affect the authority of the EPA to impose emergency orders pursuant to 42 U.S.C. 7603, “Emergency Powers.”  
[40 CFR 70.6(f)(3)(i)]

**8.3 Duty to Comply**

- 8.3.1 The Permittee shall comply with all conditions of this operating Permit. Any Permit noncompliance constitutes a violation of the Federal Clean Air Act and the Georgia Air Quality Act and/or State rules and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. Any noncompliance with a Permit condition specifically designated as enforceable only by the State constitutes a violation of the Georgia Air Quality Act and/or State rules only and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(i)]
- 8.3.2 The Permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(ii)]
- 8.3.3 Nothing in this Permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of Permit issuance.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(f)(3)(ii)]



- 8.3.4 Issuance of this Permit does not relieve the Permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Director or any other federal, state, or local agency.  
[391-3-1-.03(10)(e)1(iv) and 40 CFR 70.7(a)(6)]

#### **8.4 Fee Assessment and Payment**

- 8.4.1 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of fee shall be determined each year in accordance with the “Procedures for Calculating Air Permit Fees.”  
[391-3-1-.03(9)]

#### **8.5 Permit Renewal and Expiration**

- 8.5.1 This Permit shall remain in effect for five (5) years from the issuance date. The Permit shall become null and void after the expiration date unless a timely and complete renewal application has been submitted to the Division at least six (6) months, but no more than eighteen (18) months prior to the expiration date of the Permit.  
[391-3-1-.03(10)(d)1(i), (e)2, and (e)3(ii) and 40 CFR 70.5(a)(1)(iii)]
- 8.5.2 Permits being renewed are subject to the same procedural requirements, including those for public participation and affected State and EPA review, that apply to initial Permit issuance.  
[391-3-1-.03(10)(e)3(i)]
- 8.5.3 Notwithstanding the provisions in 8.5.1 above, if the Division has received a timely and complete application for renewal, deemed it administratively complete, and failed to reissue the Permit for reasons other than cause, authorization to operate shall continue beyond the expiration date to the point of Permit modification, reissuance, or revocation.  
[391-3-1-.03(10)(e)3(iii)]

#### **8.6 Transfer of Ownership or Operation**

- 8.6.1 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director. The new Permit may be processed as an administrative amendment if no other change in this Permit is necessary, and provided that a written agreement containing a specific date for transfer of Permit responsibility coverage and liability between the current and new Permittee has been submitted to the Division at least thirty (30) days in advance of the transfer.  
[391-3-1-.03(4)]

#### **8.7 Property Rights**

- 8.7.1 This Permit shall not convey property rights of any sort, or any exclusive privileges.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iv)]

**8.8 Submissions**

- 8.8.1 Reports, test data, monitoring data, notifications, annual certifications, and requests for revision and renewal shall be submitted to:

**Georgia Department of Natural Resources  
Environmental Protection Division  
Air Protection Branch  
Atlanta Tradeport, Suite 120  
4244 International Parkway  
Atlanta, Georgia 30354-3908**

- 8.8.2 Any records, compliance certifications, and monitoring data required by the provisions in this Permit to be submitted to the EPA shall be sent to:

**Air and Radiation Division  
Air Planning and Implementation Branch  
U. S. EPA Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-3104**

- 8.8.3 Any application form, report, or compliance certification submitted pursuant to this Permit shall contain a certification by a responsible official of its truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[391-3-1-.03(10)(c)2, 40 CFR 70.5(d) and 40 CFR 70.6(c)(1)]

- 8.8.4 Unless otherwise specified, all submissions under this permit shall be submitted to the Division only.

**8.9 Duty to Provide Information**

- 8.9.1 The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the Permit application, shall promptly submit such supplementary facts or corrected information to the Division.

[391-3-1-.03(10)(c)5]

- 8.9.2 The Permittee shall furnish to the Division, in writing, information that the Division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall also furnish to the Division copies of records that the Permittee is required to keep by this Permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA, if necessary, along with a claim of confidentiality.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(v)]

## 8.10 Modifications

- 8.10.1 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit application to the Division. The application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.  
[391-3-1-.03(1) through (8)]

## 8.11 Permit Revision, Revocation, Reopening and Termination

- 8.11.1 This Permit may be revised, revoked, reopened and reissued, or terminated for cause by the Director. The Permit will be reopened for cause and revised accordingly under the following circumstances:  
[391-3-1-.03(10)(d)1(i)]
- a. If additional applicable requirements become applicable to the source and the remaining Permit term is three (3) or more years. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if the effective date of the requirement is later than the date on which the Permit is due to expire, unless the original permit or any of its terms and conditions has been extended under Condition 8.5.3;  
[391-3-1-.03(10)(e)6(i)(I)]
  - b. If any additional applicable requirements of the Acid Rain Program become applicable to the source;  
[391-3-1-.03(10)(e)6(i)(II)] (Acid Rain sources only)
  - c. The Director determines that the Permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Permit; or  
[391-3-1-.03(10)(e)6(i)(III) and 40 CFR 70.7(f)(1)(iii)]
  - d. The Director determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.  
[391-3-1-.03(10)(e)6(i)(IV) and 40 CFR 70.7(f)(1)(iv)]
- 8.11.2 Proceedings to reopen and reissue a Permit shall follow the same procedures as applicable to initial Permit issuance and shall affect only those parts of the Permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable.  
[391-3-1-.03(10)(e)6(ii)]

- 8.11.3 Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Director at least thirty (30) days in advance of the date the Permit is to be reopened, except that the Director may provide a shorter time period in the case of an emergency.  
[391-3-1-.03(10)(e)6(iii)]
- 8.11.4 All Permit conditions remain in effect until such time as the Director takes final action. The filing of a request by the Permittee for any Permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, shall not stay any Permit condition.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iii)]
- 8.11.5 A Permit revision shall not be required for changes that are explicitly authorized by the conditions of this Permit.
- 8.11.6 A Permit revision shall not be required for changes that are part of an approved economic incentive, marketable Permit, emission trading, or other similar program or process for change which is specifically provided for in this Permit.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(8)]

## **8.12 Severability**

- 8.12.1 Any condition or portion of this Permit which is challenged, becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this Permit.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(5)]

## **8.13 Excess Emissions Due to an Emergency**

- 8.13.1 An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.  
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(1)]
- 8.13.2 An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the Permittee demonstrates, through properly signed contemporaneous operating logs or other relevant evidence, that:
  - a. An emergency occurred and the Permittee can identify the cause(s) of the emergency;
  - b. The Permitted facility was at the time of the emergency being properly operated;

- c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in the Permit; and
  - d. The Permittee promptly notified the Division and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 8.13.3 In an enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency shall have the burden of proof.  
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(4)]
- 8.13.4 The emergency conditions listed above are in addition to any emergency or upset provisions contained in any applicable requirement.  
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(5)]

#### **8.14 Compliance Requirements**

##### **8.14.1 Compliance Certification**

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than February 28 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(5)]

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and

- e. Any additional requirements specified by the Division.

#### 8.14.2 Inspection and Entry

- a. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Division to perform the following:  
[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(2)]
  - i. Enter upon the Permittee's premises where a Part 70 source is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this Permit; and
  - iv. Sample or monitor any substances or parameters at any location during operating hours for the purpose of assuring Permit compliance or compliance with applicable requirements as authorized by the Georgia Air Quality Act.
- b. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for Permit revocation and assessment of civil penalties.  
[391-3-1-.07 and 40 CFR 70.11(a)(3)(i)]

#### 8.14.3 Schedule of Compliance

- a. For applicable requirements with which the Permittee is in compliance, the Permittee shall continue to comply with those requirements.  
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(A)]
- b. For applicable requirements that become effective during the Permit term, the Permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.  
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(B)]
- c. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of Permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.  
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(C)]

#### 8.14.4 Excess Emissions

- a. Excess emissions resulting from startup, shutdown, or malfunction of any source which occur though ordinary diligence is employed shall be allowed provided that:  
[391-3-1-.02(2)(a)7(i)]

- i. The best operational practices to minimize emissions are adhered to;
  - ii. All associated air pollution control equipment is operated in a manner consistent with good air pollution control practice for minimizing emissions; and
  - iii. The duration of excess emissions is minimized.
- b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction are prohibited and are violations of Chapter 391-3-1 of the Georgia Rules for Air Quality Control.  
[391-3-1-.02(2)(a)7(ii)]
- c. The provisions of this condition and Georgia Rule 391-3-1-.02(2)(a)7 shall apply only to those sources which are not subject to any requirement under Georgia Rule 391-3-1-.02(8) – New Source Performance Standards or any requirement of 40 CFR, Part 60, as amended concerning New Source Performance Standards.  
[391-3-1-.02(2)(a)7(iii)]

## **8.15 Circumvention**

### **State Only Enforceable Condition.**

- 8.15.1 The Permittee shall not build, erect, install, or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of the pollutants in the gases discharged into the atmosphere.  
[391-3-1-.03(2)(c)]

## **8.16 Permit Shield**

- 8.16.1 Compliance with the terms of this Permit shall be deemed compliance with all applicable requirements as of the date of Permit issuance provided that all applicable requirements are included and specifically identified in the Permit.  
[391-3-1-.03(10)(d)6]
- 8.16.2 Any Permit condition identified as “State only enforceable” does not have a Permit shield.

## **8.17 Operational Practices**

- 8.17.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to the Division that may include, but is not

limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.

[391-3-1-.02(2)(a)10]

**State Only Enforceable Condition.**

8.17.2 No person owning, leasing, or controlling, the operation of any air contaminant sources shall willfully, negligently or through failure to provide necessary equipment or facilities or to take necessary precautions, cause, permit, or allow the emission from said air contamination source or sources, of such quantities of air contaminants as will cause, or tend to cause, by themselves, or in conjunction with other air contaminants, a condition of air pollution in quantities or characteristics or of a duration which is injurious or which unreasonably interferes with the enjoyment of life or use of property in such area of the State as is affected thereby. Complying with Georgia's Rules for Air Quality Control Chapter 391-3-1 and Conditions in this Permit, shall in no way exempt a person from this provision.

[391-3-1-.02(2)(a)1]

**8.18 Visible Emissions**

8.18.1 Except as may be provided in other provisions of this Permit, the Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.

[391-3-1-.02(2)(b)1]

**8.19 Fuel-burning Equipment**

8.19.1 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, in operation or under construction on or before January 1, 1972 in amounts equal to or exceeding 0.7 pounds per million BTU heat input.

[391-3-1-.02(2)(d)]

8.19.2 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, constructed after January 1, 1972 in amounts equal to or exceeding 0.5 pounds per million BTU heat input.

[391-3-1-.02(2)(d)]

8.19.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any fuel-burning equipment constructed or extensively modified after January 1, 1972, visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.

[391-3-1-.02(2)(d)]

**8.20 Sulfur Dioxide**



- 8.20.1 Except as may be specified in other provisions of this Permit, the Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in any fuel burning source that has a heat input capacity below 100 million BTUs per hour.  
[391-3-1-.02(2)(g)]

## 8.21 Particulate Emissions

- 8.21.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, let, permit, suffer, or allow the rate of emission from any source, particulate matter in total quantities equal to or exceeding the allowable rates shown below. Equipment in operation, or under construction contract, on or before July 2, 1968, shall be considered existing equipment. All other equipment put in operation or extensively altered after said date is to be considered new equipment.  
[391-3-1-.02(2)(e)]

- a. The following equations shall be used to calculate the allowable rates of emission from new equipment:

$$E = 4.1P^{0.67}; \text{ for process input weight rate up to and including 30 tons per hour.}$$
$$E = 55P^{0.11} - 40; \text{ for process input weight rate above 30 tons per hour.}$$

- b. The following equation shall be used to calculate the allowable rates of emission from existing equipment:

$$E = 4.1P^{0.67}$$

In the above equations, E = emission rate in pounds per hour, and  
P = process input weight rate in tons per hour.

## 8.22 Fugitive Dust

[391-3-1-.02(2)(n)]

- 8.22.1 Except as may be specified in other provisions of this Permit, the Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
  - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;

- d. Covering, at all times when in motion, open bodied trucks transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

8.22.2 The opacity from any fugitive dust source shall not equal or exceed 20 percent.

### 8.23 Solvent Metal Cleaning

8.23.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, suffer, allow, or permit the operation of a cold cleaner degreaser subject to the requirements of Georgia Rule 391-3-1-.02(2)(ff) "Solvent Metal Cleaning" unless the following requirements for control of emissions of the volatile organic compounds are satisfied:  
[391-3-1-.02(2)(ff)1]

- a. The degreaser shall be equipped with a cover to prevent escape of VOC during periods of non-use,
- b. The degreaser shall be equipped with a device to drain cleaned parts before removal from the unit,
- c. If the solvent volatility is 0.60 psi or greater measured at 100 °F, or if the solvent is heated above 120 °F, then one of the following control devices must be used:
  - i. The degreaser shall be equipped with a freeboard that gives a freeboard ratio of 0.7 or greater, or
  - ii. The degreaser shall be equipped with a water cover (solvent must be insoluble in and heavier than water), or
  - iii. The degreaser shall be equipped with a system of equivalent control, including but not limited to, a refrigerated chiller or carbon adsorption system.
- d. Any solvent spray utilized by the degreaser must be in the form of a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which will not cause excessive splashing, and
- e. All waste solvent from the degreaser shall be stored in covered containers and shall not be disposed of by such a method as to allow excessive evaporation into the atmosphere.

### 8.24 Incinerators

8.24.1 Except as specified in the section dealing with conical burners, no person shall cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", in amounts equal to or exceeding the following:  
[391-3-1-.02(2)(c)1-4]

- a. Units with charging rates of 500 pounds per hour or less of combustible waste, including water, shall not emit fly ash and/or particulate matter in quantities exceeding 1.0 pound per hour.
  - b. Units with charging rates in excess of 500 pounds per hour of combustible waste, including water, shall not emit fly ash and/or particulate matter in excess of 0.20 pounds per 100 pounds of charge.
- 8.24.2 No person shall cause, let, suffer, permit, or allow from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.
- 8.24.3 No person shall cause or allow particles to be emitted from an incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" which are individually large enough to be visible to the unaided eye.
- 8.24.4 No person shall operate an existing incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" unless:
- a. It is a multiple chamber incinerator;
  - b. It is equipped with an auxiliary burner in the primary chamber for the purpose of creating a pre-ignition temperature of 800°F; and
  - c. It has a secondary burner to control smoke and/or odors and maintain a temperature of at least 1500°F in the secondary chamber.

## 8.25 Volatile Organic Liquid Handling and Storage

- 8.25.1 The Permittee shall ensure that each storage tank subject to the requirements of Georgia Rule 391-3-1-.02(2)(vv) "Volatile Organic Liquid Handling and Storage" is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.  
[391-3-1-.02(2)(vv)(1)]

## 8.26 Use of Any Credible Evidence or Information

- 8.26.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.  
[391-3-1-.02(3)(a)]

**8.27 Internal Combustion Engines**

- 8.27.1 For diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005, the Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart IIII - "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines." Such requirements include but are not limited to:  
[40 CFR 60.4200]
- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart IIII.
  - b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart IIII.
  - c. Conduct engine maintenance prescribed by the engine manufacturer in accordance with Subpart IIII.
  - d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart IIII. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
  - e. Maintain any records in accordance with Subpart IIII
  - f. Maintain a list of engines subject to 40 CFR 60 Subpart IIII, including the date of manufacture.[391-3-1-.02(6)(b)]
- 8.27.2 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart JJJJ - "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines," for spark ignition internal combustion engines(s) (gasoline, natural gas, liquefied petroleum gas or propane-fired) manufactured after July 1, 2007 or modified/reconstructed after June 12, 2006.  
[40 CFR 60.4230]
- 8.27.3 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines."

For diesel-fired emergency generator engines defined as "existing" in 40 CFR 63 Subpart ZZZZ (constructed prior to June 12, 2006 for area sources of HAP, constructed prior to June 12, 2006 for  $\leq 500$ hp engines at major sources, and constructed prior to December 19, 2002 for  $> 500$ hp engines at major sources of HAP), such requirements (if applicable) include but are not limited to:

[40 CFR 63.6580]

- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart ZZZZ.
- b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart ZZZZ.
- c. Conduct the following in accordance with Subpart ZZZZ.
  - i. Change oil and filter every 500 hours of operation or annually, whichever comes first
  - ii. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first and replace as necessary
  - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.
- d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart ZZZZ. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as “emergency generators” for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
- e. Maintain any records in accordance with Subpart ZZZZ
- f. Maintain a list of engines subject to 40 CFR 63 Subpart ZZZZ, including the date of manufacture.[391-3-1-.02(6)(b)]

## 8.28 Boilers and Process Heaters

- 8.28.1 If the facility/site is an area source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - “General Provisions” and 40 CFR 63 Subpart JJJJJ - “National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers.”  
[40 CFR 63.11193]
- 8.28.2 If the facility/site is a major source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - “General Provisions” and 40 CFR 63 Subpart DDDDD - “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.”  
[40 CFR 63.7480]

**Attachments**

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

## List Of Standard Abbreviations

[illegible]


**ATTACHMENT B**

**NOTE:** Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

**INSIGNIFICANT ACTIVITIES CHECKLIST**

<b>Category</b>	<b>Description of Insignificant Activity/Unit</b>	<b>Quantity</b>
<b>Mobile Sources</b>	1. Cleaning and sweeping of streets and paved surfaces	
<b>Combustion Equipment</b>	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.	
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.	
	iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning:	
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm).7	
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	
	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
<b>Trade Operations</b>	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	10
<b>Maintenance, Cleaning, and Housekeeping</b>	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	1
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	



# Title V Permit

Southern Veneer Products

Permit No.: 2436-017-0031-V-05-0

## INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Laboratories and Testing</b>	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	1
<b>Pollution Control</b>	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
<b>Industrial Operations</b>	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	
	v) Bakery ovens and confection cookers.	
	vi) Feed mill ovens.	
	vii) Surface coating drying ovens	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	1
	i) Activity is performed indoors; &	
	ii) No significant fugitive particulate emissions enter the environment; &	
	iii) No visible emissions enter the outdoor atmosphere.	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

## Title V Permit

Southern Veneer Products

Permit No.: 2436-017-0031-V-05-0

### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	4
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	2
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	15
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	

### INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Glue Tanks	4
Log Conditioning Chests	7

# Title V Permit

Southern Veneer Products

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## ATTACHMENT B (continued)

### GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
Bark Hog (Source Code HOG)	1	No	No	Yes
Chip Bin (Source Code CBIN)	1	No	No	Yes
Log and Chip Storage Piles (Source Code CHIP)	4	No	No	Yes
Veneer Clipper (Source Code CLIP)	1	No	No	Yes
Dry Waste Bin (Source Code DBIN)	1	No	No	Yes
Log Debarker (Source Code DBRK)	1	No	No	Yes
Dry Waste Hog (Source Code DHOG)	1	No	No	Yes
Hog Fuel Bin (Source Code HBIN)	1	No	No	Yes
Whole Log Chipper (Source Code LGCH)	1	No	No	Yes
Lilypad Chipper (Source Code LLCH)	1	No	No	Yes
Veneer Lathe (Source Code LTHE)	1	No	No	Yes
Plant Roads (Source Code PLRD)	1	No	No	Yes
Trimming – Plywood (Source Code PTRM)	4	No	No	Yes
Trim Saws – 54” Saws (Source Code SAWS)	2	No	No	Yes
Chip Screen (Source Code SCRN)	1	No	No	Yes
Stackers (Source Code STKR)	1	No	No	Yes
Veneer Chipper (Source Code VNCH)	1	No	No	Yes
Trimming – Wet and Dry Veneer	2	No	No	Yes

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	0
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	0
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0

**ATTACHMENT C****LIST OF REFERENCES**

1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
3. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.*
4. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.*
5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at [www.epa.gov/ttn/chief/ap42/index.html](http://www.epa.gov/ttn/chief/ap42/index.html).
6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at [www.epa.gov/ttn/chief/software/tanks/index.html](http://www.epa.gov/ttn/chief/software/tanks/index.html).
7. The Clean Air Act (42 U.S.C. 7401 et seq).
8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).